

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

| | | |
|---------------------------|---|------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| -vs- |) | Case No. <u>CR-19-128-HE</u> |
| |) | |
| LEE MICHAEL HARRISON, |) | Violation: 18 U.S.C. § 1343 |
| |) | |
| Defendant. |) | |

INFORMATION

The United States Attorney charges:

Introduction

At all times relevant to this Information:

1. **LEE MICHAEL HARRISON**, the defendant, was a resident of the Western District of Oklahoma.
2. In the spring of 2014, **HARRISON** was in a dating relationship with K.L. Through his relationship with K.L., **HARRISON** met her father, J.L.
3. **HARRISON** learned that J.L. had two separate employer-sponsored retirement accounts: one with Vanguard and the other with

Northern Trust. **HARRISON** knew J.L. intended to use the funds in these accounts to support J.L. and his wife during retirement.

4. In the spring of 2014 through January 28, 2015, **HARRISON** had access to a Chase Bank account ending in 5315 belonging to his girlfriend K.L.

COUNT 1
(Wire Fraud)

5. The United States Attorney incorporates paragraphs 1-4 by reference.

The Scheme to Defraud

6. From on or about March 1, 2014, through January 28, 2015, **HARRISON** devised and intended to devise a scheme to defraud J.L., and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and acted with the specific intent to defraud.

Manner and Means

7. It was part of the scheme that, in the spring of 2014, **HARRISON** convinced J.L. that **HARRISON** was a skilled stock investor who could make J.L. rich if given access to J.L.'s retirement funds.

8. It was further part of the scheme that, in the spring of 2014, **HARRISON** convinced J.L. to open two E*Trade brokerage accounts ending in 0241 and 8725 and two Chase bank accounts ending in 9575 and 8058.

9. It was further part of the scheme that **HARRISON** convinced J.L. to give **HARRISON** online access to the accounts described in the immediately preceding paragraph.

10. It was further part of the scheme that, in April and May of 2014, **HARRISON** convinced J.L. to liquidate J.L.'s Vanguard and Northern Trust retirement accounts and transfer the cash into accounts **HARRISON** could access. In particular, J.L. transferred \$253,405.13 to the E*Trade account ending in 0241; \$40,000.24 to the Chase account ending in 5315; and \$35,000 to the Chase account ending in 9575.

11. It was further part of the scheme that, during the summer, fall, and winter of 2014, **HARRISON** sent J.L. messages and fake brokerage account screenshots by text messages in which he falsely represented that he had successfully invested J.L.'s money, making J.L. hundreds of millions of dollars.

12. It was further part of the scheme that **HARRISON** actually spent J.L.'s retirement funds for **HARRISON's** own personal benefit, including living expenses, and **HARRISON** convinced J.L. to spend some of his own

retirement funds, erroneously thinking he (J.L.) was worth hundreds of millions of dollars as a result of **HARRISON's** investing acumen.

13. It was further part of the scheme that **HARRISON** caused: the Chase account ending in 9575 to have a zero balance and a \$16,918.87 overdraft write-off on December 2, 2014; the Chase account ending in 5315 to have a zero balance and a \$319.96 overdraft write-off on November 12, 2014; and the E*Trade account ending in 0241 to have a balance of \$46.99 on January 31, 2016.

Execution of the Scheme

14. From July 2, 2014, through July 10, 2014, in the Western District of Oklahoma,

----- **LEE MICHAEL HARRISON**, -----
having described the scheme to defraud described above, for the purpose of executing the scheme in a material manner, knowingly caused to be transmitted signals and sounds by means of wire communication in interstate commerce. In particular, on July 2, 2014, **HARRISON** caused a wire transfer of \$40,000 of J.L.'s retirement funds from the E*Trade account ending in 8725 (to which **HARRISON** had previously transferred them) to the Chase account ending in 9575. Later that day **HARRISON** then wired \$30,000 from the Chase account ending in 9575 to the Chase account ending in 8058. Then, on

July 10, 2014, **HARRISON** wired \$20,000 from the Chase account ending in 8058 to State Credit Holdings LLC account with American National Bank of Omaha.

All in violation of Title 18, United States Code, Section 1343.

ROBERT J. TROESTER
First Assistant United States Attorney



BRANDON HALE
Assistant U.S. Attorney